

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

REVIEW OF FEDERAL COMMUNICATIONS)	
COMMISSION'S TRIENNIAL REVIEW ORDER)	CASE NO.
REGARDING UNBUNDLING REQUIREMENTS)	2003-00379
FOR INDIVIDUAL NETWORK ELEMENTS)	

**AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, LLC'S
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 32-35)
TO BELL SOUTH TELECOMMUNICATIONS, INC.**

AT&T Communications of the South Central States, LLC ("AT&T"), pursuant to the Kentucky Public Service Commission's Orders issued in this docket on October 2, 2003 and November 4, 2003, respectively, hereby serves its Second Request for Production of Documents to BellSouth Telecommunications, Inc. ("BellSouth"). Also pursuant to that Order, AT&T requests that the following documents be made available for inspection and copying in the AT&T office located at 1200 Peachtree Street, NE, Suite 8100, Atlanta, Georgia, on or before December 15, 2003 or at such time and place as may be mutually agreeable to counsel. In lieu of production for inspection, upon agreement of counsel, BellSouth may provide copies of all responsive documents to AT&T at the address noted above on or before December 15, 2003.

DEFINITIONS

1. "BellSouth" means BellSouth Telecommunications, Inc. and its parents, subsidiaries, and affiliates, their present and former officers, employees, agents, representatives, directors, and all other persons acting or purporting to act on behalf of BellSouth.
2. The terms "you" and "your" refer to BellSouth.

3. "AT&T" means AT&T Communications of the South Central States, LLC, their present and former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of AT&T.

4. The term "person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.

5. The term "document" shall have the broadest possible meaning under applicable law. "Document" means every writing or record of every type and description that is in the possession, custody or control of BellSouth, including, but not limited to, correspondence, memoranda, drafts, work papers, summaries, stenographic or handwritten notes, studies, publications, books, pamphlets, reports, surveys, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including, but not limited to, electronic mail files; and copies of such writings or records containing any commentary or notation whatsoever that does not appear in the original. The term "document" further includes, by way of illustration and not limitation, schedules, progress schedules, time logs, drawings, computer disks, charts projections, time tables, summaries of other documents, minutes, surveys, work sheets, drawings, comparisons, evaluations, laboratory and testing reports, telephone call records, personal diaries, calendars, personal notebooks, personal reading files, transcripts, witness statements and indices.

6. The term "referring or relating to" means any oral, graphic, demonstrative, telephonic, verbal, electronic, written or other conveyance of information, including, but not limited to, conversations, telecommunications and documents.

7. The term "referring or relating to" means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving,

dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.

8. “And” and “or” as used herein shall be construed both conjunctively and disjunctively and each shall include the other whenever such construction will serve to bring within the scope of these discovery requests and information what would not otherwise not be brought within their scope.

9. The singular as used herein shall include the plural and the masculine gender shall include the feminine and the neuter.

10. “Hot cut” refers to the entire process necessary to physically transfer from one carrier to another a working voice grade access line that remains working after the transfer.

11. “Bulk Hot Cut” refers to any hot cut(s) performed by BellSouth in which multiple customers of a CLEC are migrated to the CLEC or to a different network configuration (UNE-P to UNE-L), and managed by BellSouth as a joint migration event or project.

12. “Individual Hot Cut” refers to all hot cuts that are not bulk hot cuts.

13. “Access Line” refers to a working analogue voice grade access line used to serve residential and small business customers, or a working voice grade line served by Digital Loop Carrier Systems (“DLC”) that is used for serving residential and small business customers. “Access Line” does not, for example, include high capacity systems such as DS1 and ISDN-PRI.

14. Unless otherwise stated, information requests refer to BellSouth’s nine-state region.

15. “CLEC” means a “competitive local exchange carrier,” as defined in 47 U.S.C. § 153(26), which is not an “incumbent local exchange carrier” as defined in 47 U.S.C. § 251(h).

16. “ILEC” refers to Incumbent Local Exchange Carrier.

17. "CO" refers to Central Office.
18. "CWINS" refers to Customer Wholesale Interconnection Services.
19. "UNE-L" refers to Unbundled Network Element-Loop.
20. "UNE-P" refers to Unbundled Network Element –Platform.

INSTRUCTIONS

1. If you contend that a document in response to any document request may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such document in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim:

- a) the privilege asserted and its basis;
- b) the nature of the information withheld;
- c) the subject matter of the document, except to the extent that you claim it is privileged.

2. These discovery requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These discovery requests are intended to include requests for information which is physically within BellSouth's possession, custody or control as well as in the possession, custody or control of BellSouth's agents, attorneys, or other third parties from which such documents may be obtained.

3. If any document request cannot be fully complied with, comply to the extent possible and specify the reasons for your inability to comply fully.

4. These document requests are continuing in nature and require supplemental responses should additional documents become available.

REQUESTS FOR PRODUCTION OF DOCUMENTS

- 32) Provide all documents, methods and procedures, work instructions or training material for BellSouth's Coordinated Cut Scheduling System ("CCSS").
- 33) Provide all documents, methods and procedures, work instructions or training material for BellSouth's Load Control System and management instructions used in the Load Control Work Functions performed in the CWINS centers.
- 34) In BellSouth's response to Interrogatory No. 13, BellSouth states "force modeling is used to determine resources needed to handle volumes". Specifically for field installation and central office personnel, provide all documents, methods and procedures, work instructions or training material used to conduct "force modeling." If as part or all of its response BellSouth directs AT&T to its response Request for Production of Documents No. 8, indicate specifically where in its response to Request for Production of Documents No. 8 is information relevant for field installation and central office personnel.
- 35) Provide a copy of the most recent non-recurring cost studies conducted in BellSouth's nine-state region, including all associated detailed work activity descriptions and work times, for pricing a hot cut order coordination – specified conversion time, for a SL-1 loop. Show work activity descriptions and work times separately for each of the associated work groups:
- (a) customer Wholesale Interconnection Network Services (CWINS) Center;
 - (b) central office (CO) Frame Attendant;
 - (c) central office Electronic Technician; and
 - (d) other Central Office Personnel, if any.

Submitted this 24th day of November, 2003.



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